

# **EXHIBIT B**

1 IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
2 CAMDEN VICINAGE

— — —

IN RE: VALSARTAN, : MDL NO. 2875  
 LOSARTAN, AND :  
 IRBESARTAN PRODUCTS : CIVIL NO.  
 LIABILITY LITIGATION : 19-2875  
 : (RBK/JS)

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7  
8

THIS DOCUMENT APPLIES : HON. ROBERT  
TO ALL CASES : B. KUGLER  
- CONFIDENTIAL INFORMATION -  
SUBJECT TO PROTECTIVE ORDER

VOLUME I

— — —

May 27, 2021

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Videotaped remote deposition of JUN DU, taken pursuant to notice, was held via Zoom Videoconference, beginning at 9:16 a.m., EST, on the above date, before Michelle L. Gray, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Realtime Reporter, and Notary Public.

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1 GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1 bit of experience and the fact that you  
2 went to New Jersey Institute of  
3 Technology. Is that -- what we were  
4 provided, was that the most up-to-date  
5 LinkedIn profile?

6 A. Could you please repeat your  
7 question?

8 Q. Did you provide us your most  
9 recent LinkedIn profile?

10 A. No, I did not.

11 Q. Somebody provided us a  
12 LinkedIn profile for you. Do you know  
13 who did that?

14 A. I do not know.

15 Q. Request Number 2 asked if  
16 you had any documents to produce that  
17 were not produced previously. Are there  
18 any documents that are being produced in  
19 connection with this deposition in  
20 response to this deposition notice?

21 A. I keep all my relevant  
22 documents and information according to  
23 the court order.

24 Q. And what is your

1 understanding as to what -- how you were  
2 supposed to keep those documents pursuant  
3 to the court order?

4 A. I'm supposed to keep all the  
5 relevant documents.

6 Q. When did you first find out  
7 that you had to hold your documents and  
8 not delete or destroy anymore?

9 A. That was since I received  
10 the notification from my counsel.

11 Q. What day was that?

12 A. I do not recall the exact  
13 date.

14 Q. What year was it?

15 A. I'm not sure about that  
16 either, but I believe it was in 2018.

17 Q. You said when your lawyer  
18 told you or your counsel told you. Which  
19 counsel are you talking about?

20 A. Seth.

21 Q. What type of computer or  
22 computers do you use in your work?

23 A. I used my desktop computer  
24 and my personal computer.

1 MR. SLATER: There was a  
2 back -- a feedback. I couldn't  
3 understand the answer, Dr. Shao.

4 THE WITNESS: I used my  
5 desktop computer and my personal  
6 computer.

7 BY MR. SLATER:

8 Q. The desktop, where is that  
9 located?

10 A. The desktop computer is  
11 located in my office at Princeton.

12 Q. What address is that?

13 A. 700 Atrium Drive, Somerset,  
14 New Jersey.

15 The current address is  
16 700 Atrium Drive, 2nd Floor, Somerset,  
17 New Jersey. Zip code is 08520.

18 Sorry, I just provided the  
19 incorrect zip code. Let me make a  
20 correction. It's 08873 rather.

21 Q. What type of desktop --  
22 rephrase.

23 What manufacturer or brand  
24 of desktop computer is that?

1           A.       I'm not sure. It was  
2       installed for me by my IT staff.

3           Q.       How long have you had it?

4           A.       I believe it has been there  
5       for two to three years also.

6           Q.       Did you have another desktop  
7       computer before that at Princeton?

8           A.       There used to be another  
9       desktop computer that I used the same  
10      hard disc -- or hard drive.

11          Q.       Do you mean the hard drive  
12      from the prior computer was brought  
13      forward and used with the new computer?

14          A.       That is what my IT staff  
15      told me.

16          Q.       Do you know if that hard  
17      drive was swept and the documents and  
18      information were provided to us?

19          A.       When it comes to my desktop  
20      computer, the sweeping was arranged to be  
21      done by third party through our consult.

22          Q.       Have you maintained hardcopy  
23      documents regarding your work?

24          A.       No, I haven't.

1 Q. Do you have an office in  
2 China, at any of ZHP's offices in China?

3 A. No, I don't.

4 Q. Do you have a laptop  
5 computer?

6 A. That is correct, I do.

7 Q. Do you use the laptop for  
8 work?

9 A. That is correct. I do use  
10 my personal laptop computer for work.

11 Q. Was that laptop -- rephrase.  
12 What brand of laptop is it?

13 A. It is an Apple MacBook.

14 Q. How long have you had that  
15 laptop?

16 A. I believe I have been using  
17 it since 2015 also. I do not recall the  
18 exact year.

19 Q. Was that laptop provided to  
20 the third party that swept the --  
21 rephrase.

22 Was that laptop provided to  
23 the third party so the documents and  
24 information could be provided to us?

1 A. That is correct.

2 Q. Do you have a smartphone  
3 that you use for work?

4 A. That is correct.

5 Q. What type?

6 A. It's an iPhone Model 8.

7 Q. How long have you had that?

8 A. I do not recall how long I  
9 been using it. I believe I started in  
10 2016 also.

11 Q. Was that iPhone provided to  
12 the third party vendor to pull off  
13 documents or information for us?

14 A. No.

15 Q. Did anybody ask you for it  
16 from work -- rephrase.

17 Did any attorneys or --  
18 rephrase.

19 Did anybody ask you for the  
20 iPhone so that it could be evaluated so  
21 documents and information could be  
22 provided to us?

23 A. No.

24 MR. SLATER: I don't know



1 e-mails between June 4, 2018, and  
2 June 12, 2018?

3 A. Can you repeat your  
4 question?

5 Q. Yeah. Did you send or  
6 receive any e-mails related to your work  
7 between June 4, 2018, and June 12, 2018?

8 A. I do not recall. I do not  
9 know what type of e-mails you're  
10 referring to either.

11 Q. Any e-mails having to do  
12 with work.

13 A. I don't know because I  
14 didn't keep track of that.

15 I already kept all the  
16 e-mails but I do not recall, because it  
17 was long time ago.

18 Q. Do you keep a calendar?

19 A. No.

20 Q. Do you use Outlook to keep  
21 track of your appointments?

22 A. I never, ever used Outlook  
23 before.

24 Q. Do you write down your

1 schedule on a piece of paper?

2 A. I don't do such a thing.

3 Q. How do you keep track of  
4 your schedule without any sort of a  
5 calendar whatsoever?

6 A. In general my secretary  
7 would inform me of any meeting in my  
8 e-mail.

9 Q. Who is your secretary?

10 A. Shi-shi Ouyang, spelled as  
11 O-U-Y-A-N-G, as her last name.

12 Q. Where does she work, what  
13 office?

14 A. In the office of Princeton in  
15 New Jersey.

16 Q. Was that true in June of  
17 2018 that she would keep track of your  
18 calendar and your schedule?

19 A. I do not know.

20 Q. How long has she worked for  
21 you?

22 A. For about two years.

23 Q. Do you know when she started  
24 with you?